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May 24, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation in WT Docket No. 10-119**

Dear Ms. Dortch:

On May 22, 2018 on behalf of President Electronics USA (GPE USA), I participated in a teleconference with members of the FCC's Wireless Telecommunications Bureau (WTB). The teleconference was scheduled at the request of the WTB to hear GPE USA's opinion on the *PETITION FOR RECONSIDERATION Regarding Revised Rule § 95.1763(c)* WT Docket No. 10-119 for adding FM (Frequency Modulation) channels to the existing AM (Amplitude Modulation) channels. The FCC participants on the call were Scot Stone, Melissa Conway and Thomas Derenge, all with the WTB's Mobility Division. I represented GPE USA on the call in my capacity as the General Manager of the company.

Please find below a summary of the points expressed by GPE USA on the teleconference relating to the petition for adding FM channels to the Citizen Band Radio Service (CBRS) in the USA

- Our parent company Groupe President Electronics (GPE), the European market leader for CBRS equipment, has 40 years of experience in the supply of AM/FM CB radios in Europe. The majority of our European markets allow both AM and FM for CBRS.
- We believe AM and FM have unique advantages and together provide a better user experience for CBRS. For example, AM can provide longer distance communication due to ionospheric skip whereas FM can provide higher quality communication as they are less prone to noise.
- Our experience in Europe indicates the complementary nature of AM and FM. Both types of modulation co-exist and remain relevant in CBRS. We still manufacture and sell AM only radios in Europe today in addition to AM/FM models.
- We also agree that the concerns of backward compatibility are addressed by keeping the CBRS requirement of 40 channel AM radios. FM would simply be an allowed option that suppliers could make available on select or all models of their product range. This would ensure that all radios would continue to always have 40 channel AM in the market.

- One of the attractive aspects of CBRS is ease-of-use. In order to continue with the ease-of-use principle we recommend FM be available on 40 channels like AM. Many CBRS users in the US are already familiar with managing 40 AM channels along with the option of SSB across the 40 channels. Having FM available across the same 40 channel frequencies would keep the user experience consistent.
- With reference to the prior point on how to implement the FM channels there was a consideration raised by WTB with respect to how FM implementation might impact the use and monitoring of Channel 9 and 19 on AM. As a follow-up I have discussed this point with our team at GPE in Europe. In the event that the WTB determines that this is a concern, the 40 channels of FM could be implemented with their own frequencies distinct from AM; this would allow all the current AM channels including 9 and 19 to be operated and monitored as they were. As an example this type of configuration is used in Germany where an additional 40 FM channels operate at a frequency distinct from AM.

If there are any questions regarding this matter, please contact me.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Kavi Sharma', with a stylized flourish at the end.

Kavi Sharma  
Chief Operating Officer/General Manager  
President Electronics USA  
1007 Collier Center Way  
Naples, FL 34110

CC: Meeting Participants